

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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VITCOM, LLC,	:
	:
Plaintiff,	:
	:
-against-	:
	:
AT&T CORP.,	:
	:
Defendant.	:
-----X	

Date Filed:

Index No.

SUMMMONS WITH NOTICE

Venue is based on the residence of defendants

TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the State, or within thirty (30) days after completion of service where service is made in any other manner.

YOU ARE HEREBY NOTIFIED THAT should you fail to appear or answer, judgment in default will be entered against you for the relief demanded below, plus the costs and disbursements of this action.

Dated: Brooklyn, New York
June 21, 2018

FEINZEIG & JASKIEL
Attorney for Plaintiff

Solomon J. Jaskiel

Solomon J. Jaskiel, Esq.
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Brooklyn, NY 11234
(347) 462-2295 soljas@gmail.com

NOTICE:

This is a collection action arising from AT&T's refusal to pay invoices arising from Vitcom's provision of telecommunication services. The sum of the invoices sought to be collected is \$1.5 million.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

VITCOM, LLC,

Plaintiff,

-against-

AT&T CORP.,

Defendant.

Index No. 653117/2018

**NOTICE OF APPEARANCE AND
DEMAND FOR COMPLAINT**

PLEASE TAKE NOTICE that the undersigned attorneys, who are admitted to practice before this Court, hereby appear as counsel for defendant AT&T Corp. ("AT&T"), pursuant to CPLR 3012(b), and demand that a copy of the Complaint and all further pleadings, papers, and documents in this action be served upon them. AT&T does not waive any defenses, including, without limitation, defenses to service and personal jurisdiction.

Dated: New York, New York
October 23, 2018

SIDLEY AUSTIN LLPBy: /s/ Eamon P. Joyce

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Attorneys for AT&T Corp.

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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VITCOM, LLC,	:	
	:	
Plaintiff,	:	Index No. 653117/2018
	:	
-against-	:	<u>COMPLAINT</u>
	:	
AT&T CORP.,	:	
	:	
Defendant.	:	
-----X		

Vitcom, LLC (“Vitcom”), by its attorneys, Feinzeig & Jaskiel, as and for its complaint against AT&T Corp. (“AT&T”), alleges as follows:

1. This is a collection action arising from AT&T’s failure to pay for the use of Vitcom’s facilities to deliver toll free calls from end user customers to AT&T’s toll free service subscribers.
2. Vitcom is a domestic limited liability company. Vitcom does business in the State of New York, County of New York. Vitcom is in the telecommunications business.
3. AT&T is a domestic corporation. AT&T does business in the State of New York, County of New York. AT&T is in the telecommunications business.
4. AT&T has used Vitcom’s facilities to switch and deliver toll free calls from end user customers to AT&T for ultimate delivery to AT&T’s toll-free subscribers.
5. Vitcom filed with the FCC an interstate access tariff. Vitcom has filed with the various states intrastate access tariffs. Collectively, these tariffs set forth and control the amount AT&T must pay to Vitcom for the use of its facilities to switch and deliver the toll-free calls.
6. Starting in January 2014, Vitcom has billed AT&T the appropriate tariffed rate for the use of its facilities. The total amount of the invoices is \$1,422,445.41.

7. AT&T has, unjustifiably, refused to pay the invoices.
8. AT&T breached its duty to pay the tariffed rates for the use of Vitcom's facilities.

WHEREFORE, Vitcom demands judgment in an amount equal to the total of the amounts billed on the invoices rendered by Vitcom to AT&T, but no less than \$1,422,445.41, plus late payment fees, prejudgment interest, attorneys' fees and such other relief that may just and proper.

Dated: Brooklyn, New York
December 12, 2018

FEINZEIG & JASKIEL
Attorney for Plaintiff

Solomon J. Jaskiel

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X
VITCOM, LLC,

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– against –

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Index No. 653117/2018

**STIPULATION EXTENDING
TIME TO RESPOND TO
COMPLAINT**

WHEREAS, on December 12, 2018, Plaintiff Vitcom, LLC served a copy of the Complaint in this proceeding on Defendant AT&T Corp. (“AT&T”), making AT&T’s appearance due originally by or on January 2, 2019,

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys, that the deadline for AT&T to serve an answer, make a motion which has the effect of extending AT&T’s time to answer, or otherwise respond to the Complaint is hereby extended to and includes January 31, 2019; and

IT IS FURTHER STIPULATED AND AGREED that a facsimile signature on this document shall have the same force and effect as an original signature.

Dated: New York, New York
December 20, 2018

SOLOMON J. JASKIEL

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Attorneys for Defendant AT&T Corp.